

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE SELENIOUS ACID LITIGATION

C.A. No. 2:24-cv-07791 (BRM) (CLW)
(Consolidated)

Motion Day: April 7, 2025

JOINT MOTION TO SEAL

PLEASE TAKE NOTICE that at 10:00 a.m. on April 7, 2025, or such other time and date as set by the Court, Plaintiff American Regent, Inc. (“Plaintiff”) and Defendant Accord Healthcare, Inc. (“Accord”), Defendant Aspiro Pharma Ltd. (“Aspiro”), Defendants Cipla USA, Inc. and Cipla Limited (collectively, “Cipla”), Defendants Dr. Reddy’s Laboratories, Inc. and Dr. Reddy’s Laboratories, Ltd. (collectively, “DRL”), Defendant Gland Pharma Ltd. (“Gland”), Defendant Hikma Pharmaceuticals USA Inc. (“Hikma”), Defendant RK Pharma, Inc. (“RK Pharma”), Defendants Somerset Therapeutics, LLC, Somerset Pharma, LLC, and Odin Pharmaceuticals, LLC (collectively, “Somerset”), Defendants Sun Pharmaceutical Industries Limited and Sun Pharmaceutical Industries, Inc. (collectively, “Sun”), Defendants Xiromed, LLC and Xiromed Pharma España, S.L. (collectively, “Xiromed”), and Defendant Zydus Pharmaceuticals (USA) Inc. (“Zydus”) (together, “Defendants”) (all collectively, the “Parties”), will move before the Honorable Cathy L. Waldor, U.S.M.J., for entry of an Order, pursuant to L. Civ. R. 5.3(c) and 7.1, to seal:

- **Portions of the February 3, 2025 Letter from Charles H. Chevalier to The Honorable Brian R. Martinotti, U.S.D.J. (ECF No. 119); and**
- **Portions of the February 4, 2025 Letter from James S. Richter to The Honorable Brian R. Martinotti, U.S.D.J. (ECF No. 121).**

(“the Materials”).

Pursuant to L. Civ. R. 7.1(d)(4), no legal brief is required because all relevant proposed findings of fact and conclusions of law required by L. Civ. R. 5.3(c)(2) have been set forth in the Declarations of Charles H. Chevalier and James S. Richter.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the Parties will rely upon the declarations and the Index required by L. Civ. R. 5.3(c)(3) in the form suggested by Appendix U, as well as all other pleadings and memoranda on file in this matter.

PLEASE TAKE FURTHER NOTICE that a proposed Order containing proposed findings of fact and conclusions of law is attached hereto in accordance with L. Civ. R. 5.3(c)(3).

Dated: February 4, 2025

Respectfully Submitted by:

s/ Charles H. Chevalier
Charles H. Chevalier
GIBBONS P.C.
One Gateway Center
Newark, New Jersey 07102-5310
(973) 596-4611
cchevailier@gibbonslaw.com

Christine A. Gaddis
GIBBONS P.C.
141 West Front Street, Suite 240
Red Bank, New Jersey 07701
(732) 704-5801
cgaddis@gibbonslaw.com

OF COUNSEL

Dennies Varughese, Pharm. D.
Uma N. Everett
Adam C. LaRock
Christina E. Dashe
Alexander Alfano
Ryan E. Conkin

Sterne, Kessler, Goldstein & Fox P.L.L.C.
1101 K Street NW, 10th Floor
Washington, DC 20005
(202) 371-2600
dvarughese@sternekessler.com
ueverett@sternekessler.com
alarock@sternekessler.com
cdashe@sternekessler.com
aalfano@sternekessler.com
rconkin@sternekessler.com

*Attorneys for Plaintiff
American Regent, Inc.*